

**SUMMARY SHEET**  
**Airworthiness Directive Implementation Aviation Rulemaking Committee**  
*AD Development Working Group*

<b>Primary Report and Recommendation</b>	AD Compliance Review Team (Task 2), Recommendation 4: (Bullet 4), <i>Compliance Times in NPRMs/ADs</i>
<b>Secondary Report and Recommendation</b>	None.
<b>Assigned Members</b>	Holly Thorson (AIR) (POC) Tim Dowling (Boeing) (POC) Tammy Anderson (AIR) Elizabeth Bumann (AIR) Jim Orchard (AFS) Eric Blancaneaux (Airbus) Marco Capaccio (EASA) Ross Stewart (ABX) Rafael Marques (Embraer) Oswaldo de Oliveira (ANAC) Craig Fabian (ARSA) Plamen Stoyanov (Alaska) Barry Baker (Pinnacle)
<b>Links to Other Working Groups</b>	
<b>Date Sent to AD Development WG</b>	17 May 2010
<b>Date Sent to other WGs for Review</b>	22 July 2010
<b>Date Submitted to ARC</b>	27 September 2010
<b>Date of ARC Approval</b>	9 February 2011

**WORKING GROUP REVIEW OF ISSUE/PROBLEM**

In consideration of the AD ARC recommendation that the first compliance deadlines should always be stated in the agency’s Airworthiness Directive (AD) notice of proposed rulemaking (NPRM) and in the final rule (see related finding/recommendation text at the end of this paper), the WG reviewed the Transport Airplane Directorate (TAD) practices.

*Background:* In past years, the TAD specified compliance times in detail in the regulatory text of all transport AD final rules. When compliance times are simple, this practice does not raise issues. Examples of simple compliance time terminology used in transport ADs include the following:

- “Within 60 days after the effective date of this AD.”
- “Before the accumulation of 10,000 total flight hours, or within 12 months after the effective date of this AD, whichever occurs later.”

However, service bulletins (SB) may involve complex compliance times—i.e., affecting multiple airplane configurations. Restating these times in the regulatory text of an AD often requires

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revising the compliance time terminology presented in the SB to ensure the language used in the AD is legally enforceable. In doing so, errors might be inadvertently introduced. Also, restating those compliance times from the SB can result in very lengthy ADs.

*Potential Solution Example:* Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007 is an example of a SB with complex compliance times. The SB contains 178 pages. The Compliance section contains numerous pages of tables to cover various configurations, with different actions and corresponding compliance times.

However, the SB presented complex compliance requirements in a manner that met the criteria for “AD-Friendly” service bulletins (discussed below). This enabled the FAA to incorporate the SB’s Compliance paragraph by reference in the AD. A copy of the NPRM is attached to this proposal to demonstrate how regulatory text of an AD can incorporate complex compliance requirements set forth in a SB (see text highlighted in red in Attachment 1), without undue burden to the FAA and to minimize confusion for the industry.

*“AD-Friendly” Service Bulletins:* In 2000, during a telephone conference with nine major air carriers and the Air Transport Association, the TAD asked what the FAA could do to make transport ADs easier to read and understand. The group requested that the ADs simply state, “do the service bulletin”, i.e., the operators requested that ADs reference SBs for actions and compliance times as much as possible to minimize the need to compare the ADs with the SBs for differences.

In 2001, the TAD began working with a DAH on the “AD-Friendly” (ADF) SB initiative. This led to a 2006 working agreement between the FAA and a DAH on “Agreed Principles and Practices” for ADF SBs related to transport airplanes. The agreement was part of a joint effort to identify and implement improvements to the format and quality of service instructions and ADs.

As part of the ADF initiative, the TAD studied the operators’ request to state in the AD to “do the service bulletin.” To ensure compliance with agency rulemaking requirements, the TAD has to ensure consistency and clarity in its rules; therefore anything it incorporates by reference (IBRs) in a final rule must meet the same standard.

Among other things, the TAD found that DAHs often included compliance times in several places in the SB—such as flowcharts, figures, and even the Accomplishment Instructions—instead of placing them in a single appropriate location (i.e., the “Compliance” paragraph of the SB). The TAD also found that having the same or similar information in several places led to conflicting information in the SB. A rule cannot cause obvious confusion to operators and others required to comply with an AD.

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After further meetings and review of the regulatory versus commercial requirements, the ADF team agreed that complex compliance times should: (1) be presented in table format, rather than text format; (2) be placed only in the “Compliance” paragraph of the SB; and (3) use regulatory compliance terminology. When these “AD-Friendly” criteria are met in the SB, the TAD is able to refer to the “Compliance” paragraph of the SB when expressing complex compliance times in the regulatory paragraphs of the AD.

The issue that results from this approach, as identified in the subject recommendation, involves lack of visibility of initial compliance times when they are not fully documented in an ADF AD.

**REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW**

*Notice N8110.112, Placing Service Information in FDMS*

**WORKING GROUP PROPOSAL TO ADDRESS THE RECOMMENDATION(S)/FINDING(S)**

The FAA has already met the intent of the AD CRT’s recommendation in ADs that specify simple compliance times, including ADs in the ADF format, as well as in ADs with complex compliance times identified in SBs that are not written in the ADF format. In those ADs, the compliance times are identified in the regulatory text of the NPRM and the final rule AD. However, as discussed previously, restating these complex compliance times from the SB in the regulatory text of an AD can result in lengthy and confusing ADs as well as an increased potential for errors.

The TAD has developed a written internal procedure that outlines its process for handling compliance times. For complex compliance times specified in ADF SBs, the FAA provides a “range” of those times (including the first and last deadlines) in the NPRM preamble. The FAA refers to the SB for specific compliance times in both the NPRM and final rule. For ADs that involve multiple airplane groups/configurations or multiple actions for which there are different compliance times, the “ranges” are presented in the NPRM preamble by group, configuration, inspection area, condition, inspection type, etc., as reflected in the SB. (This information is not restated in the final rule AD.) As stated above, for non-ADF SBs (with complex or simple compliance times), the compliance times are identified in the regulatory text of the NPRM and the final rule AD.

The FAA has not received any negative feedback from DAHs or operators on this practice. On the contrary, since the FAA worked closely with operators during the development of ADF SB concept, the FAA has received positive feedback on the way compliance times are presented in ADF SBs and referenced in the corresponding ADs.

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On September 28, 2010, the FAA issued Notice N8110.112, *Placing Service Information into the Federal Docket Management System (FDMS)*. This Notice allows the FAA to post information incorporated by reference in FAA ADs into the FDMS. Posting SBs that are IBRed in final rules will allow anyone to view the compliance times. The Notice also allows the FAA to post service information documents that are identified in an NPRM if written consent from the DAH is provided. Since FAA Notices are temporary directives, the FAA will incorporate the information in Notice N8110.112 into the next revision to the AD Manual, FAA-IR-M-8040.1.

For DAHs that do not grant permission to post non-IBRed information and/or SBs at the NPRM stage, the FAA will still include the range of compliance times in the NPRM preamble to meet the requirement that the agency provide enough information for the public to make substantive comments to its proposed rule as well as the intent of the recommendation to include the "initial compliance time" in the NPRM.

The combination of these two actions meets the intent of the AD CRT's recommendation for complex compliance times that are specified in SBs written in the ADF format. The AD Development Working Group believes our proposal fully meets the intent of the AD CRT recommendation.

#### **ALTERNATIVES CONSIDERED**

Since the range of complex compliance times is provided in the NPRM preamble, but is not restated in the corresponding final rule AD, the FAA considered including the range as a statement in the AD regulatory text of the final rule AD. However, explanations of the compliance time ranges are often quite lengthy, which would conflict with the operators' requests to keep our ADs short and simple by just referring to the SB for compliance times. Additionally, since the FAA intends to post IBRed SBs on FDMS, the detailed compliance information will be available for anyone to view.

#### **IMPLEMENTATION PLAN**

To fully meet the intent of the AD CRT recommendation for ADs with complex compliance times written from SBs in the ADF format, the FAA issued Notice N8110.112, *Placing Service Information into the Federal Docket Management System (FDMS)*, on September 28, 2010.

#### **ASSUMPTIONS/CONSTRAINTS**

The AD Development Working Group assumes that the intent of the AD CRT's recommendation is for the FAA to specify the first compliance deadline in both the NPRM and the final rule AD without just referencing the "Compliance" paragraph of an SB in the regulatory text. (Note that

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the FAA simply references the Compliance paragraph of the SB in the regulatory text of ADs developed from SBs in the ADF format.)

**ISSUES FOR WORKING GROUP CONSIDERATION**

N/A

**ISSUES FOR ARC CONSIDERATION**

N/A

**FINDING No. 4**

The Team found systemic problems in the AD process as follows:

- Multiple ADs affecting airworthiness in the same area of the airplane resulting in overlapping and confusing mandates for air carriers. This can lead to inadvertent noncompliance or reversal of previous AD actions.
- Occasionally, the OEM's service instructions are not available when the AD NPRM is issued. In addition, copies of service instructions are not included in the Government's electronic regulatory docket system. In either case, this prevents air carriers from having the full comment period to comment on the specifics of the service document.
- ADs generally have an aggressive installation timeline. Because of the urgent nature of AD tasks and the need for planning to minimize aircraft out-of-service time, air carriers frequently accomplish service instructions ahead of the AD issuance date. This creates an exposure to noncompliance when there are changes in the final AD that differ from the originally released service document.

**RECOMMENDATION No. 4, B-4**

At a minimum, the first compliance deadline should always be stated in the NPRM and AD.

Note: Other Summary Papers will address other assigned recommendations linked with the subject finding.

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**APPENDIXES**

**ATTACHMENT 1**

[4910-13-U]

**DEPARTMENT OF TRANSPORTATION**

**Federal Aviation Administration**

**14 CFR Part 39**

**[Docket No. FAA-2007-27560; Directorate Identifier 2006-NM-211-AD]**

**RIN 2120-AA64**

**Airworthiness Directives;** Boeing Model 757-200, -200PF, and -200CB Series Airplanes

**AGENCY:** Federal Aviation Administration (FAA), Department of Transportation (DOT).

**ACTION:** Notice of proposed rulemaking (NPRM).

**SUMMARY:** The FAA proposes to adopt a new airworthiness directive (AD) for certain Boeing Model 757-200, -200PF, and -200CB series airplanes. This proposed AD would require inspections to detect scribe lines and cracks of the fuselage skin, lap joints, circumferential butt splice strap, and external and internal approved repairs; and related investigative/corrective actions if necessary. This proposed AD results from reports of scribe lines adjacent to the skin lap joints. We are proposing this AD to detect and correct cracks, which could grow and cause rapid decompression of the airplane.

**DATES:** We must receive comments on this proposed AD by [insert date 45 days after date of publication in the FEDERAL REGISTER].

**ADDRESSES:** Use one of the following addresses to submit comments on this proposed AD.

- DOT Docket web site: Go to <http://dms.dot.gov> and follow the instructions for sending your comments electronically.

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• Government-wide rulemaking web site: Go to <http://www.regulations.gov> and follow the instructions for sending your comments electronically.

• Mail: Docket Management Facility, U.S. Department of Transportation, 400 Seventh Street SW., Nassif Building, room PL-401, Washington, DC 20590.

• Fax: (202) 493-2251.

• Hand Delivery: Room PL-401 on the plaza level of the Nassif Building, 400 Seventh Street SW., Washington, DC, between 9:00 a.m. and 5:00 p.m., Monday through Friday, except Federal holidays.

Contact Boeing Commercial Airplanes, P.O. Box 3707, Seattle, Washington 98124-2207, for the service information identified in this proposed AD.

**FOR FURTHER INFORMATION CONTACT:** Dennis Stremick, Aerospace Engineer, Airframe Branch, ANM-120S, FAA, Seattle Aircraft Certification Office, 1601 Lind Avenue, SW., Renton, Washington 98057-3356; telephone (425) 917-6450; fax (425) 917-6590.

**SUPPLEMENTARY INFORMATION:**

**Comments Invited**

We invite you to submit any relevant written data, views, or arguments regarding this proposed AD. Send your comments to an address listed in the ADDRESSES section. Include the docket number “FAA-2007-27560; Directorate Identifier 2006-NM-211-AD” at the beginning of your comments. We specifically invite comments on the overall regulatory, economic, environmental, and energy aspects of the proposed AD. We will consider all comments received by the closing date and may amend the proposed AD in light of those comments.

We will post all comments we receive, without change, to <http://dms.dot.gov>, including any personal information you provide. We will also post a report summarizing each substantive verbal contact with FAA personnel concerning this proposed AD. Using the search function of that web site, anyone can find and read the comments in any of our dockets, including the name

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of the individual who sent the comment (or signed the comment on behalf of an association, business, labor union, etc.). You may review DOT's complete Privacy Act Statement in the *Federal Register* published on April 11, 2000 (65 FR 19477-78), or you may visit <http://dms.dot.gov>.

**Examining the Docket**

You may examine the AD docket on the Internet at <http://dms.dot.gov>, or in person at the Docket Management Facility office between 9:00 a.m. and 5:00 p.m., Monday through Friday, except Federal holidays. The Docket Management Facility office (telephone (800) 647-5227) is located on the plaza level of the Nassif Building at the DOT street address stated in the ADDRESSES section. Comments will be available in the AD docket shortly after the Docket Management System receives them.

**Discussion**

We have received reports of scribe lines found adjacent to the skin lap joints on Model 757-200 airplanes. The scribe lines appear to have been made on the skin when sealant was removed as part of preparation of the airplane for repainting. The airplanes had between 13,300 and 16,800 flight cycles. Although no cracks as a result of scribe lines have been reported on Model 757 airplanes, scribe lines have caused cracks on other airplanes. Undetected cracking, if not corrected, could grow and result in rapid decompression.

**Related AD**

This proposed AD is similar to AD 2006-07-12, amendment 39-14539 (71 FR 16211, March 31, 2006). That AD applies to all Boeing Model 737-100, -200, -200C, -300, -400, and -500 series airplanes. That AD requires a one-time inspection for scribe lines and cracks in the fuselage skin at certain lap joints, butt joints, external repair doublers, and other areas; and related investigative/corrective actions if necessary. That AD resulted from reports of fuselage skin cracks adjacent to the skin lap joints on airplanes that had scribe lines.

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**Relevant Service Information**

We have reviewed Boeing Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007. The service bulletin describes procedures for removing paint and sealant at the applicable zonal locations, and doing detailed inspections to detect scribe lines and cracks of the fuselage skin, lap joints, circumferential butt splice strap, and external and internal approved repairs. The service bulletin specifies repairing scribe lines before further flight, except when a limited return to service (LRTS) program for qualifying scribe lines would allow return to service for a limited period before scribe lines are repaired.

**Comment [R01]:** The writer uses the language from the Description section of the service bulletin to develop this part of the AD preamble. Also, the writer uses paragraph 1.E. of the service bulletin to describe a “range” of compliance times so the public is given adequate notice and opportunity to comment on the NPRM.

The LRTS program includes repetitive inspections to detect cracks where scribe lines were found. To qualify for an LRTS program, a scribe line must meet certain criteria including the total flight cycles on the airplane, and the location and extent of the scribe lines. The service bulletin specifies contacting Boeing for final repair instructions for the LRTS program, which would eliminate the need for the repetitive inspections of the LRTS program. The repetitive intervals for the LRTS program range from 1,500 to 8,000 flight cycles, depending on the location of the scribe lines and the configuration of the airplane.

Each piece of structure susceptible to a scribe line is assigned to a zone. Based on criticality of location, the service bulletin addresses the most critical areas (zones) first and appropriately reduces the compliance requirements for less critical areas. The service bulletin has specific instructions for calculating separate inspection thresholds. These thresholds are based on (1) fatigue life for the identified zonal locations and (2) potential scribe line opportunities in an airplane’s maintenance history. The compliance times for inspecting are 20,000 flight cycles (Zone 1) and 30,000 flight cycles (Zone 2) after the first scribe opportunity. If a maintenance records-based threshold program is not used, however, the service bulletin specifies 6,000 flight cycles as the first scribe opportunity. Since a scribe line can occur at any time during the service life of an airplane and at many locations, the service bulletin uses both total flight cycles and structural criticality of locations to determine the inspection requirements.

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**FAA’s Determination and Requirements of the Proposed AD**

We have evaluated all pertinent information and identified an unsafe condition that is likely to exist or develop on other airplanes of this same type design. For this reason, we are proposing this AD, which would require accomplishing the actions specified in the service information described previously, except as discussed below.

**Differences Between the Proposed AD and Service Information**

The service bulletin specifies to contact the manufacturer for instructions on how to repair certain conditions, but this proposed AD would require repairing those conditions by using a method that we approve, or by using data that meet the certification basis of the airplane, and that have been approved by an Authorized Representative for the Boeing Commercial Airplanes Delegation Option Authorization Organization whom we have authorized to make those findings.

The service bulletin specifies compliance times relative to the date of issuance of the service bulletin; however, this proposed AD would require compliance before the specified compliance time relative to the effective date of the AD.

**Costs of Compliance**

There are about 945 airplanes of the affected design in the worldwide fleet; of these, about 634 are U.S.-registered airplanes. The following table provides the estimated costs for U.S. operators to comply with this proposed AD. There are no U.S.-registered airplanes in Group 5 or Group 6.

**Estimated Costs**

Inspections	Work hours	Average labor rate per hour	Cost per airplane	Number of U.S.-registered airplanes	Fleet cost
Group 1	127	\$80	\$10,160	144	\$ 1,463,040
Group 2	122	\$80	\$ 9,760	6	\$ 58,560
Group 3	154	\$80	\$12,320	75	\$ 924,000

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Inspections	Work hours	Average labor rate per hour	Cost per airplane	Number of U.S.-registered airplanes	Fleet cost
Group 4	128	\$80	\$10,240	409	\$ 4,188,160

**Authority for this Rulemaking**

Title 49 of the United States Code specifies the FAA’s authority to issue rules on aviation safety. Subtitle I, Section 106, describes the authority of the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the Agency’s authority.

We are issuing this rulemaking under the authority described in Subtitle VII, Part A, Subpart III, Section 44701, “General requirements.” Under that section, Congress charges the FAA with promoting safe flight of civil aircraft in air commerce by prescribing regulations for practices, methods, and procedures the Administrator finds necessary for safety in air commerce. This regulation is within the scope of that authority because it addresses an unsafe condition that is likely to exist or develop on products identified in this rulemaking action.

**Regulatory Findings**

We have determined that this proposed AD would not have federalism implications under Executive Order 13132. This proposed AD would not have a substantial direct effect on the States, on the relationship between the national Government and the States, or on the distribution of power and responsibilities among the various levels of government.

For the reasons discussed above, I certify that the proposed regulation:

1. Is not a “significant regulatory action” under Executive Order 12866;
2. Is not a “significant rule” under the DOT Regulatory Policies and Procedures (44 FR 11034, February 26, 1979); and
3. Will not have a significant economic impact, positive or negative, on a substantial number of small entities under the criteria of the Regulatory Flexibility Act.

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We prepared a regulatory evaluation of the estimated costs to comply with this proposed AD and placed it in the AD docket. See the ADDRESSES section for a location to examine the regulatory evaluation.

**List of Subjects in 14 CFR Part 39**

Air transportation, Aircraft, Aviation safety, Safety.

**The Proposed Amendment**

Accordingly, under the authority delegated to me by the Administrator, the FAA proposes to amend 14 CFR part 39 as follows:

**PART 39 - AIRWORTHINESS DIRECTIVES**

1. The authority citation for part 39 continues to read as follows:

Authority: 49 U.S.C. 106(g), 40113, 44701.

**§ 39.13 [Amended]**

2. The Federal Aviation Administration (FAA) amends § 39.13 by adding the following new airworthiness directive (AD):

**BOEING:** Docket No. FAA-2007-27560; Directorate Identifier 2006-NM-211-AD.

**Comments Due Date**

(a) The FAA must receive comments on this AD action by [insert date 45 days after date of publication in the FEDERAL REGISTER].

**Affected ADs**

(b) None.

**Applicability**

(c) This AD applies to Boeing Model 757-200, -200PF, and -200CB series airplanes, certificated in any category; as identified in Boeing Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007.

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**Unsafe Condition**

(d) This AD results from reports of scribe lines adjacent to the fuselage skin lap joints.

We are issuing this AD to detect and correct cracks, which could grow and cause rapid decompression of the airplane.

**Compliance**

(e) You are responsible for having the actions required by this AD performed within the compliance times specified, unless the actions have already been done.

**Inspections**

(f) Perform detailed inspections to detect scribe lines and cracks of the fuselage skin, lap joints, circumferential butt splice strap, and external and internal approved repairs; and perform related investigative and corrective actions. **Do the actions in accordance with the Accomplishment Instructions of Boeing Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007, except as required by paragraph (g) of this AD. Do the actions within the applicable compliance times specified in paragraph 1.E. of the service bulletin, except as required by paragraph (h) of this AD.**

**Exceptions to Service Bulletin Specifications**

(g) Where Boeing Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007, specifies to contact Boeing for appropriate repair instructions, repair using a method approved in accordance with the procedures specified in paragraph (j) of this AD.

(h) Boeing Alert Service Bulletin 757-53A0092, Revision 1, dated January 10, 2007, specifies compliance times relative to the date of issuance of the service bulletin; however, this proposed AD would require compliance before the specified compliance time relative to the effective date of the AD.

**Comment [RO2]:** Because the service bulletin was done in an AD-Friendly manner, the basic AD requirements are only one paragraph long. We were able to translate 178 pages of service bulletin details into this short paragraph. Provided we give adequate notice in the AD preamble, we can simply reference the service bulletin Accomplishment Instructions of an AD-friendly service bulletin for instructions on how the operators must comply, and reference paragraph 1.E. (Compliance) of the service bulletin for compliance times.

**Comment [RO3]:** Paragraphs (g) and (h) are "canned" language we use to correspond to the Differences paragraph in the AD preamble.

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**Credit for Prior Accomplishment**

(i) Inspections done before the effective date of this AD in accordance with Boeing Alert Service Bulletin 757-53A0092, dated September 18, 2006, are acceptable for compliance with the corresponding requirements of paragraph (f) of this AD.

**Alternative Methods of Compliance (AMOCs)**

(j)(1) The Manager, Seattle Aircraft Certification Office (ACO), FAA, has the authority to approve AMOCs for this AD, if requested in accordance with the procedures found in 14 CFR 39.19.

(2) Before using any AMOC approved in accordance with § 39.19 on any airplane to which the AMOC applies, notify the appropriate principal inspector in the FAA Flight Standards Certificate Holding District Office.

(3) An AMOC that provides an acceptable level of safety may be used for any repair required by this AD, if it is approved by an Authorized Representative for the Boeing Commercial Airplanes Delegation Option Authorization Organization who has been authorized by the Manager, Seattle ACO, to make those findings. For a repair method to be approved, the repair must meet the certification basis of the airplane.

Issued in Renton, Washington, on March 1, 2007.

Ali Bahrami,  
Manager,  
Transport Airplane Directorate,  
Aircraft Certification Service.